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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

TEVA PHARMACEUTICALS USA, INC.,

Plaintiff,

vs.

CORCEPT THERAPEUTICS, INC., et al.,

Defendants.

Case No. 5:24-cv-03567-NW

Honorable Noël Wise

**DEFENDANTS' NOTICE OF SUBMISSION
OF PROPOSED STIPULATED
PROTECTIVE ORDER**

1 On February 28, 2025, the parties submitted via joint letter brief a discovery dispute to
2 Magistrate Judge DeMarchi concerning whether the stipulated protective order in this case should
3 permit a party's designated in-house counsel access to "Highly Confidential" materials produced by
4 another party in discovery. *See* Dkt. 82. The parties attached to their joint letter brief their respective
5 proposed protective orders. *See* Dkt. 82-1 (Teva's proposal); Dkt. 82-2 (Defendants' proposal). On
6 March 14, 2025, Judge DeMarchi entered an order adopting Defendants' proposed protective order
7 without prejudice. *See* Dkt. 87. Judge DeMarchi's order provided that "Defendants shall promptly
8 file their proposed form of protective order as a separate entry on the docket for signature by the
9 Court." *Id.* at 4. Pursuant to that order, Defendants respectfully submit as an attachment to this filing
10 their proposed form of the protective order. Defendants' proposed protective order is materially the
11 same as the version submitted as an attachment to the parties' discovery letter brief (Dkt. 82-2), but
12 it makes minor, non-substantive typographical edits; a redline showing in tracked changes these edits
13 from Defendants' prior version is also attached to this filing. Concurrent with this filing, Defendants
14 are also via email submitting to Judge DeMarchi's chambers a Microsoft Word version of their
15 proposed form of protective order.

1 DATED: March 17, 2025

2 By: /s/ Robert W. Stone

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1 **CIVIL LOCAL RULE 5-1 ATTESTATION**

2 I, Robert W. Stone, am the ECF user whose credentials were utilized in the electronic filing
3 of this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in
4 the filing of this document has been obtained from each of the signatories listed above.

5
6 DATED: March 17, 2025

7
8 By /s/ Robert W. Stone
9 Robert W. Stone

10
11
12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on this 17th day of March 2025, I electronically transmitted the foregoing
14 document to the Clerk's Office using the CM/ECF System, causing it to be electronically served on
15 all attorneys of record.

16
17 By /s/ Robert W. Stone
18 Robert W. Stone